



**ROBINSON MCFADDEN**  
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.  
COLUMBIA, SOUTH CAROLINA

**Bonnie D. Shealy**

1901 MAIN STREET, SUITE 1200

POST OFFICE BOX 944

COLUMBIA, SOUTH CAROLINA 29202

September 3, 2014

**PH**  
(803) 779-8900

**FAX**  
(803) 252-0724

bshealy@robinsonlaw.com

**VIA ELECTRONIC FILING**

Ms. Jocelyn Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Plantation Moving & Storage, Inc.**  
**Docket No. 2014-289-T**

Dear Ms. Boyd:

Enclosed for filing is the Transcript of the Telephone Deposition of Robert K. Burkhardt, the shipper witness for Plantation Moving & Storage, Inc. By copy of this letter we are serving the same on the parties of record. Should you need any other information, please let me know.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

Bonnie D. Shealy

BDS/tch  
Enclosures

cc/enc: Andrew M. Bateman, Esquire (via email & U.S. Mail)  
Jeffrey M. Nelson, Esquire (via email & U.S. Mail)  
Ms. Jessica Hodges (via email)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2014-289-T

-----X

IN RE: :

Application of Plantation Moving :

& Storage, Inc. for a Class E :

(Household Goods) Certificate of :

Public Convenience and Necessity :

for Operation of Motor Vehicle :

Carrier :

-----X

TELEPHONIC DEPOSITION OF ROBERT K. BURKHART

Dulles, Virginia

Tuesday, August 26, 2014

1:56 p.m.

Reported by: Michelle L. Lonas, RPR, CCR

- - - - -

COMPUSCRIPTS, INC.

A Full-Service Court Reporting Agency

Post Office Box 7172

Columbia, South Carolina 29202

803-988-0086

1-888-988-0086

compuscripts.com

1                   Telephonic Deposition of ROBERT K. BURKHART,  
2 held at the offices of:

3

4                   BAYSHORE TRANSPORTATION SYSTEM, INC.

5                   23000 Ladbrook Drive

6                   Dulles, Virginia 20166

7                   (703) 492-8900

8

9

10                  Pursuant to agreement, before Michelle L.  
11 Lonas, Registered Professional Reporter, Certified  
12 Court Reporter, and Notary Public of the Commonwealth  
13 of Virginia.

14

15

16

17

18

19

20

21

22

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S

ON BEHALF OF PLANTATION MOVING & STORAGE, INC.:

(VIA TELEPHONE)

BONNIE D. SHEALY, ESQUIRE

ROBINSON, McFADDEN & MOORE, P.C.

1901 Main Street

Suite 1200

Post Office Box 944

Columbia, South Carolina 29202

(803) 779-8900

ON BEHALF OF OFFICE OF REGULATORY STAFF:

(VIA TELEPHONE)

ANDREW M. BATEMAN, ESQUIRE

JEFFREY M. NELSON, ESQUIRE

OFFICE OF REGULATORY STAFF

1401 Main Street

Suite 900

Columbia, South Carolina 29202

(803) 737-0800

ALSO PRESENT: Jessica Hodges (Via Telephone)

1 P R O C E E D I N G S

2 (Witness was sworn by the reporter.)

3 ROBERT K. BURKHART,

4 having been duly sworn, was examined and testified as  
5 follows:

6 EXAMINATION BY COUNSEL FOR PLANTATION MOVING &  
7 STORAGE, INC.

8 BY MS. SHEALY

9 Q I am Bonnie Shealy. I represent Plantation  
10 Moving and Storage in this application for a Class E  
11 Certificate of Public Convenience and Necessity. It's  
12 before the Public Service Commission of South  
13 Carolina, and it's Docket Number 2014-289-T. This is  
14 a shipper witness deposition by telephone. It was  
15 authorized by directive of Hearing Officer David  
16 Butler, and it's being taken pursuant to a Notice of  
17 Deposition. Andrew Bateman and Jeffrey Nelson are  
18 also participating for ORS.

19 And Mr. Burkhart, if you would please,  
20 first, state your full name for us.

21 A Robert Kent Burkhart.

22 Q Thank you. We're tak -- since we're taking  
23 this deposition by telephone, it's very important for  
24 us not to talk over each other so we can make it  
25 easier on the court reporter, and so that we'll be

1 able to hear each other. And if my questions aren't  
2 clear, please ask me to repeat them or rephrase them,  
3 or tell me that you don't understand.

4 Mr. Burkhart, would you please give us your  
5 address?

6 A Um, where I work, or my home address?

7 Q Where you work will be fine.

8 A 23000 Ladbroke Drive, Dulles, Virginia,  
9 20166.

10 Q And is this where the deposition is being  
11 taken today?

12 A Yes, ma'am.

13 Q Where do you live, Mr. Burkhart?

14 A I live in Jeffersonville, Virginia.

15 Q And how long have you lived there?

16 A Eight years.

17 Q Great. Would you please tell us where  
18 you're working?

19 A I am the Operations Manager for Bayshore  
20 Transportation, agents for Allied Van Lines and North  
21 American Van Lines.

22 Q And how long have you been with Bayshore?

23 A I've been with them a year.

24 Q Would you please tell us a little bit about  
25 your background and your other experience in the

1 moving industry?

2 A I've got over 20 years' experience in the  
3 moving and storage industry, um, working for major van  
4 lines here in the Northern Virginia area.

5 Q Would you please tell us a little bit about  
6 Bayshore Transportation and what you do there?

7 A Bayshore Transportation, Allied Van Lines  
8 is the second largest booker of business in the Allied  
9 system. I'm responsible for the overall operation of  
10 an 85,000-square-foot facility, responsible for  
11 dispatching and overseeing the work of minimum 12  
12 contractors who have anywhere from four to 12  
13 employees under each contractor.

14 Q And would you please tell us a little bit  
15 about the process you use to assign movers to ship  
16 goods?

17 A First, we have to look at what the size of  
18 the shipment is. We have to look at any  
19 idiosyncrasies of the shipment. We have to look at  
20 the pack, and we have to look at the logistics of it.  
21 From that, you determine what vehicle, what crews, and  
22 what equipment are necessary to facilitate the move.

23 Q As you know, Plantation Moving and Storage  
24 has applied for authority to operate here in South  
25 Carolina. In your job now with Bayshore, you're in

1 Virginia. Do you arrange moves within South Carolina?

2 A I've had the opportunity to arrange moves  
3 in South Carolina, and to also move people into and  
4 out of South Carolina.

5 Q So that would include both interstate and  
6 moves within South Carolina?

7 A Yes. That would be intra and interstate  
8 moves.

9 Q Have you recently arranged any moves in  
10 South Carolina?

11 A I have arranged for labor through  
12 plantation. I have not, because they can't do it, had  
13 any moves go through them.

14 Q Have you arranged moves with other carriers  
15 in your experience at Bayshore in areas within South  
16 Carolina? Other than Plantation?

17 A The answer is yes, but without much  
18 success.

19 Q Would you explain why you haven't had much  
20 success?

21 A This is going to sound very egotistical,  
22 but I have a very high standard of which I try to  
23 maintain, and the people that I have used there have  
24 not been the caliber or quality of movers that I  
25 expect my clients to be associated with.



1           Q       So would you say, then, you've had some  
2       difficulty trying to find a mover when you needed them  
3       that satisfied your qualifications in South Carolina?

4           A       Yes.

5           Q       How frequently would you say you have tried  
6       to arrange moves within South Carolina? Could you  
7       tell us what areas of the state?

8           A       Uh, let's see. Usually anywhere from ten  
9       to 14 times per year. I've dealt in Charleston, Mount  
10      Pleasant, Columbia, Hilton Head, Florence, and Myrtle  
11      Beach.

12          Q       How about the upstate, Greenville and  
13      Spartanburg area? Have you had any moves up there?

14          A       I have not been up there in years.

15          Q       All right. Do you think that there's  
16      enough demand for another mover in South Carolina  
17      based on your experience trying to arrange moves in  
18      the state?

19          A       I think there's a demand for qualified  
20      movers in South Carolina.

21          Q       Could you please tell us how you know  
22      Mr. Burzynski and Ms. Hodges who are with Plantation  
23      Moving?

24          A       I've known Mike Burzynski since the year of  
25      our Lord, 1988. I actually used to work for Mike when

1 he was here in Northern Virginia. He owned three  
2 moving companies, operated all under one roof, and,  
3 um, I dispatched out anywhere from six to eight crews  
4 a day with him when he was here.

5 Q And are you aware of the relationship  
6 between Ms. Hodges and Mr. Burzynski?

7 A Yeah, it's his daughter.

8 Q You told us a little bit about his  
9 operations in Virginia. Could you expand on that a  
10 little bit?

11 A Yeah. He had a large warehouse facility.  
12 He had storage. He dealt with military, private  
13 transferees. He was an agent for Red Ball Van Lines,  
14 and maintained a very high standard of ethics.

15 Q So, if the Commission were to grant the  
16 authority to Plantation, would you use them in trying  
17 to arrange moves in South Carolina, or recommend them?

18 A Absolutely. I would do it without  
19 hesitation.

20 Q Is there anything else you'd like to add,  
21 Mr. Burkhart?

22 A I just know that in the years I've known  
23 Mike, he's a straight shooter. He doesn't play games.  
24 He's about taking care of the customer. And he also  
25 has a very high standard of expectations from the

1 crews he sends out.

2 Q Thank you, Mr. Burkhart. Would you please  
3 answer any questions that ORS would have for you?

4 A Sure.

5 EXAMINATION BY COUNSEL FOR OFFICE OF REGULATORY STAFF  
6 BY MR. BATEMAN:

7 Q Mr. Burkhart, this is Andrew Bateman. How  
8 are you doing?

9 A I'm fine, Andrew. How are you, sir?

10 Q I'm doing well. Thank you. I'm going to  
11 ask you a few questions, and I'm sure there's going to  
12 be some repetition from what Ms. Shealy just asked  
13 you, but if you don't mind just answering it anyway, I  
14 apologize ahead of time for the repetition.

15 A That's okay.

16 Q Have you appeared before the South Carolina  
17 Public Service Commission before?

18 A No.

19 Q Have you appeared before another state  
20 commission?

21 A No, sir.

22 Q Okay. In your line of work, do you have  
23 any professional certifications?

24 A No, sir.

25 Q And you told me, you briefly sort of

1 touched on your knowledge of the household goods  
2 moving industry in South Carolina. Could you sort of  
3 expound upon that?

4 A In what regard, sir?

5 Q I think you mentioned a bit that you had  
6 moved some in the low country, and I think you  
7 mentioned maybe the midlands. How familiar are you  
8 with just the household goods moving industry in South  
9 Carolina?

10 A I have never -- excuse me, I have never  
11 personally been in South Carolina to do a move. I can  
12 only go off of the feedback I get when I have utilized  
13 someone in that area.

14 Q Okay. So, do you work for an employer who  
15 offers relocation services?

16 A I worked for an employer -- yes, relo --  
17 moving services. Moving and storage services, yes.

18 Q Okay. And what types of services does your  
19 employer offer?

20 A We offer -- we offer packing, storage,  
21 international, local, intra, and interstate moving.

22 Q Okay.

23 A Fine arts storage, record storage. Just  
24 about anything that deals with storage.

25 Q Okay. And do you mind giving us an example

1 of a typical relocation that you might help with?

2 A I kind of laugh, because I don't think  
3 there's anything typical about any relocation.

4 They're all different. I mean, are you talking about  
5 a local move? An international move? An interstate  
6 move?

7 Q Well, I guess a local, local or interstate  
8 move.

9 A Okay. You know, if there's packing, you  
10 know, that's one thing. Going out and taking care of  
11 the packing, inventorying, and making sure  
12 everything's wrapped safely. Everything is padded and  
13 wrapped before it -- or should be padded and wrapped  
14 before it goes out of the home. Before entering the  
15 home, the home should also have protection throughout  
16 the home on the floors, the carpet, railings and  
17 doors. And then loading, loading the van and making  
18 sure that all the crew members are safe, and that the  
19 household goods are transported with minimal damage.

20 Q Okay. Based on your knowledge and  
21 experience in the moving industry, and you touched on  
22 this also a bit earlier, but in your opinion, are  
23 people moving to South Carolina?

24 A Yes. There are a lot of people moving to  
25 the Carolinas. I'm down in the Carolinas from

1 Virginia and Delaware almost every week.

2 Q And I think you mentioned earlier that you  
3 do have the occasion to refer moves to household goods  
4 moving companies. How often are you asked to refer  
5 moving companies?

6 A Average a dozen times a year.

7 Q And do you maintain a referral list or a  
8 resource list of moving companies?

9 A Nine times out of ten, I use the directory,  
10 the Allied directory or the North American directory.  
11 I look at their quality scores, which I'm privy to  
12 that information, and that will determine whether or  
13 not I call them or not.

14 Q I have never looked at that directory, so  
15 this may be kind of a silly question, and you may not  
16 know the answer, but how many companies are on that  
17 directory?

18 A Well, it's all the agents that are in the  
19 North American and Allied system. It's only available  
20 to the agents. It's not a public direct -- it's not a  
21 published directory.

22 Q So it's a number of companies, I mean, you  
23 know, a large number of companies that are on that  
24 directory?

25 A There are, I'm sure, hundreds of Allied

1 agents and North American agents, yes.

2 Q And when you get referrals, do you  
3 typically stay with the same kind of companies that  
4 you recommend over and over again, or does that vary  
5 pretty widely?

6 A No, it doesn't vary widely. It varies  
7 based upon the referrals I get -- or the responses I  
8 get back from the customers after they've moved. If  
9 it's been a bad experience, they don't get any more  
10 business.

11 Q And have you ever heard any complaints  
12 about Plantation Moving?

13 A No, sir.

14 Q All right, Mr. Burkhart. That is all the  
15 questions that ORS has for you. Thank you very much.

16 A You're welcome, sir.

17 THE WITNESS: Hello?

18 MS. SHEALY: Yes.

19 THE WITNESS: Is that it?

20 MS. SHEALY: Mr. Burkhart, I don't think I  
21 have any other questions. We appreciate your help  
22 with this.

23 THE WITNESS: All right.

24 THE REPORTER: Excuse me. Can I get some  
25 transcript orders, please?

1 MS. SHEALY: Sure. I'm sorry. I thought  
2 my assistant had already taken care of it. We need  
3 the transcript for an upcoming hearing, so I need the  
4 original, and if you could send me an electronic  
5 version, that would be great, too.

6 THE REPORTER: Okay. And you needed that a  
7 five-day expedite? Is that correct?

8 MS. SHEALY: Well, let's see. I'm not sure  
9 what you're classifying as expedited. Our hearing is  
10 September the 17th, but I think I need to file it  
11 ahead of time, so -- what's your normal turnaround  
12 time?

13 THE REPORTER: I'm not sure what they  
14 were -- they had told me you needed it within five  
15 days, that it was due on 9/2.

16 MS. SHEALY: I think we have a prehearing  
17 conference that day.

18 THE REPORTER: Okay. That's probably what  
19 they're trying to do, then, is get it to you for that.  
20 Is that something you need?

21 MS. SHEALY: I don't have to have it that  
22 day, but that would be great if you could have it to  
23 me that day.

24 THE REPORTER: Okay. Well, let's just go  
25 ahead with that, then, if that's -- since that's what



1 I've got here.

2 MS. SHEALY: Okay.

3 THE REPORTER: And then the other parties  
4 that were on the line, do they need copies, or --

5 MR. BATEMAN: Bonnie, if it's filed with  
6 the Commission or --

7 MS. SHEALY: Yeah, we'll be filing it  
8 before the hearing, so I think that'll be fine.

9 THE REPORTER: So no other copies are  
10 needed then? Just send the original?

11 MS. SHEALY: No. I'll need -- I need an  
12 electronic version and then the original.

13 THE REPORTER: All right. And then you --  
14 did I hear you say that signature's going to be  
15 waived?

16 MS. SHEALY: That's correct.

17 THE REPORTER: All right. That -- does  
18 that need to go on your-all's record? Do we need to  
19 put that on the record?

20 MS. SHEALY: Yes, please. If it's not --  
21 I'm sorry. I thought I covered that at the beginning.  
22 If you would please note that the witness has waived  
23 the reading and the signing.

24 THE WITNESS: I'll waive signing this.  
25 You've got it recorded, so I don't need to sign it.

1 THE REPORTER: All right. I think that's  
2 everything I need then.

3 MS. SHEALY: All right. Good. Well,  
4 thanks everyone.

5 (Signature having been waived, the  
6 deposition of ROBERT K. BURKHART was concluded at  
7 2:11 p.m.)

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Michelle L. Lonas, Registered

3 Professional Reporter, Certified Court Reporter, and

4 Notary Public for the Commonwealth of Virginia at

5 large, do certify that the aforementioned appeared

6 before me, was sworn by me, and was thereupon examined

7 by counsel; and that the foregoing is a true, correct,

8 and full transcript of the testimony adduced to the

9 best of my ability.

10 I further certify that I am neither related

11 to nor otherwise associated with any counsel or party

12 to this proceeding, nor otherwise interested in the

13 event thereof.

14 IN WITNESS WHEREOF, I have hereunto set my

15 hand and affixed my notarial seal this 2nd day of

16 September, 2014.

17

18 My Commission Expires on the 31st day of May, 2015.

19

20

21

22 Michelle L. Lonas, Notary Public #169569

23 Commonwealth of Virginia at Large

24 REGISTERED PROFESSIONAL REPORTER

25 CERTIFIED COURT REPORTER #0313254

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C O N T E N T S

EXAMINATION OF ROBERT K. BURKHART	PAGE
By Ms. Shealy	5
By Mr. Bateman	11

E X H I B I T S

(None marked)

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2014-289-T**

In Re:

Application of Plantation Moving &  
Storage, Inc. for a Class E (Household  
Goods) Certificate of Public  
Convenience and Necessity for  
Operation of Motor Vehicle Carrier

---

**CERTIFICATE OF SERVICE**

This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Transcript of the Telephone Deposition of Robert K. Burkhardt** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Andrew M. Bateman, Esquire  
Jeffrey M. Nelson, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29202

Dated at Columbia, South Carolina this 3<sup>rd</sup> day of September, 2014.



Toni C. Hawkins